Hoechst Celanese

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Break: "19
Other: (44133

Hoechst Celanese Corporation Route 202-206 North Somerville, NJ 08876 201 231 2000 Telex 833 449 Fax 201 231 3225

November 12, 1987

U.S. Environmental Protection Agency Kenneth E. Wenger, R.I. Superfund Section Waste Management Division JFK Federal Building, HSV-1907 Boston, Massachusetts 02203

Re: Picillo Site, Coventry, Rhode Island

Dear Mr. Wenger:

Merrill S. Hohman's letter of October 27, 1987 to American Hoechst Corporation's Rhode Island Works, Coventry, Rhode Island was received by our Company on October 30, 1987, and has been referred to the Legal Department for reply. Please be advised, first of all, that on February 27, 1987 American Hoechst Corporation and Celanese Corporation merged, forming Hoechst Celanese Corporation. This reply is being submitted on behalf of Hoechst Celanese Corporation.

We have thoroughly reviewed our records and are unable to find any indication that hazardous wastes generated by Hoechst Celanese were sent to the Picillo site by any means. If you could inform me of the nature and extent of the information on which you have based your opinion that Hoechst Celanese is legally responsible for cleanup of the site, we would appreciate it. In particular, it would be helpful if we knew (i) the volumes and descriptions of the hazardous wastes attributed to us in records the EPA has reviewed; (ii) the total volumes and any description of the wastes delivered to the site by all other generators, not just those parties noticed by the Agency's October 27, 1987 letter; (iii) the identity of all parties with whom site negotiations are currently underway or with whom consent agreements have been signed; (iv) the amount of money EPA under executed consent agreements: (v) a expects to realize specification covering costs for which EPA seeks reimbursement, and (vi) an estimate of future costs EPA anticipates in connection with the Picillo site.

Let us emphasize that under proper circumstances, we stand ready to cooperate with the Agency and private parties in investigation and remediation efforts now underway regarding the Picillo site. If the evidence we have requested shows that Hoechst Celanese has a share of



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responsibility for a situation that poses a threat to health and the environment, we would hope to meet that responsibility voluntarily on a basis that is both cost effective and fair to all parties concerned.

All communications to Hoechst Celanese Corporation with regard to the Picillo site should be addressed to me at the above address. My direct phone number is 201-231-3054. Copies should also be provided to Lorelei J., Esq. of Morgan, Melhuish, Monaghan, Arvidson, Abrutyn & Lisowski, 50 Broadway, Suite 1002-5, New York, New York 10004.

Very truly yours,

Robert M. Stokes, Esq.

Associate General Counsel

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RMS/031/87

cc: Mr. Paul Daggett-Rhode Island Works

Mr. Maurice Leduc- Bedminster One